

## State Water Resources Control Board

September 20, 2018

(Via email and Certified Mail)  
**CERTIFIED MAIL**  
**NO. 7017 2680 0000 6195 9012**

Mr. Brahman Conci  
Superintendent of Facilities Operations  
City and County of San Francisco  
1990 Newcomb Avenue  
San Francisco, California 94124  
[bconci@sfwater.org](mailto:bconci@sfwater.org)

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS  
LOCATED AT CITY AND COUNTY OF SAN FRANCISCO CENTRAL PUMP  
STATION, 645 SLOAT BOULEVARD, SAN FRANCISCO**

Dear Mr. Conci:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on September 12, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	<b>Failure to Maintain UST Monitoring System</b> – All sensors were in alarm at the time of inspection due to a faulty electrical board in the monitoring panel.	All	September 12, 2018	Ongoing	CCR 23 2630(d); H&SC 25291(b)
2	<b>Failure to Maintain Facility Information</b> – In CERS, the Facility Operating Permit Application indicates State Fund and CFO letter as the financial responsibility mechanism; however, the facility is using a Local Government Mechanism and Bond Ratings.	All	September 12, 2018	Ongoing	23 CCR 2711(a)

No.	Violation	Tank	Start Date	Stop Date	Regulation
3	<b>Failure to Maintain Facility and Tank Information</b> – In CERS, Tank #1 spill bucket is listed as “No”; however, a spill bucket is present at the facility.	Tank #1	September 12, 2018	Ongoing	23 CCR 2711(a)
4	<b>Failure to Maintain Monitoring Plan</b> – In CERS, the monitoring plan indicates that the ATG is used for monitoring the tank; however, an annular sensor is being used as the monitoring method	All	September 12, 2018	Ongoing	H&SC 25286(a); 23 CCR 2632(d)(1)
5	<b>Failure to Maintain Plot Plan/Site Map</b> – In CERS, the site map does not include the location of underground piping for the UST system.	All	September 12, 2018	Ongoing	23 CCR 2711(a)(8)
6	<b>Failure to Meet Designated Operator (DO) Requirements</b> – The May monthly DO inspection was not performed.	All	May 1, 2018	May 31, 2018	23 CCR 2715(c)
7	<b>Failure to Maintain Financial Responsibility</b> – The Bond Rating that is currently being used is outdated and is required to be updated every 12 months. Additionally, the Certificate of Financial Responsibility was not present or uploaded to CERS at the time of inspection.	All	September 1, 2011	Ongoing	H&SC 25292.2; 23 CCR 2711(a)(11)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and San Francisco City & County Public Health Department within sixty (60) days from the date of this letter. Have your DO make specific notations in the next monthly DO report indicating the ongoing violations have been corrected. The monthly DO report and any associated photos must be submitted as proof of compliance. On October 1, 2018, new State regulations will require an automatic line leak detector on all underground pressurized piping connected to an emergency generator system. In lieu of restricting or shutting off the flow of product, the line leak detector may activate an audible and visual alarm. The USTs at your facility currently do not have line leak detectors for the underground pressurized piping. Please work with San Francisco City & County Public Health Department to ensure your facility is in compliance with the new regulatory requirements.

Please send all compliance documentation to the following:

**State Water Board**

Mr. Joseph Lovesee  
UST Enforcement Unit  
Office of Enforcement  
State Water Resources Control Board  
801 K Street, Suite 2300  
Sacramento, California 95814  
[joseph.lovesee@waterboards.ca.gov](mailto:joseph.lovesee@waterboards.ca.gov)

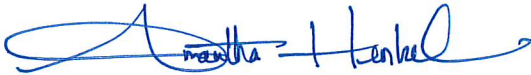
**Local CUPA**

Mr. Jin Tang  
Senior Environmental Health Inspector  
San Francisco City & County Public  
Health Department  
1390 Market Street, Suite 210  
San Francisco, California 94102  
[jin.tang@sfdph.org](mailto:jin.tang@sfdph.org)

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at [amantha.henkel@waterboards.ca.gov](mailto:amantha.henkel@waterboards.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Amantha Henkel", with a stylized flourish at the end.

Amantha Henkel  
Senior Environmental Scientist  
UST Enforcement Unit  
**Office of Enforcement**

cc: (via email only)

Ms. Paula Stewart  
Program Manager  
San Francisco City & County  
Public Health Department  
[paula.stewart@sfdph.org](mailto:paula.stewart@sfdph.org)